

## UNITED STATES DISTRICT COURT

for the

District of Oregon

United States of America

v.

Case No. 3:20-mj-00073

ALEXANDER SAMUEL STEWART

*Defendant(s)***CRIMINAL COMPLAINT  
BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of March 20, 2020 in the county of Multnomah in the  
       District of Oregon, the defendant(s) violated:*Code Section**Offense Description*

18 U.S.C. § 2113(a)

Bank Robbery

This criminal complaint is based on these facts:

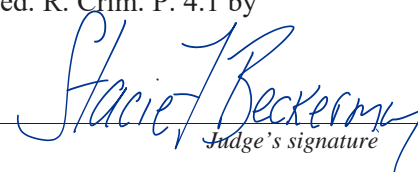
See attached affidavit of FBI Special Agent Zachary Clark

☒ Continued on the attached sheet.

By phone

*Complainant's signature*

FBI SA Zachary Clark

*Printed name and title*Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by  
telephone at 9:50 a.m./p.m.Date: April 2, 2020City and state: Portland, Oregon  
*Judge's signature*

Hon. Stacie F. Beckerman, US Magistrate Judge

*Printed name and title*

DISTRICT OF OREGON, ss: AFFIDAVIT OF ZACHARY CLARK

**Affidavit in Support of a Criminal Complaint and Arrest Warrant**

I, Zachary Clark, being duly sworn, do hereby depose and state as follows:

**Introduction and Agent Background**

1. I am a Special Agent with the Federal Bureau of Investigation and have been since July 2018. I am trained in investigating a wide variety of violations of federal criminal law. I am currently assigned to the FBI Portland Field Office on the Violent Crimes Squad, which includes conducting robbery investigations. Currently I serve as the Bank Robbery Coordinator for the Portland Field Office. I am familiar with and have participated in the normal methods of investigation, including but not limited to, the general questioning of witnesses and suspects, the review of phone and computer records, physical surveillance, and the detection and collection of evidence. As part of my training and experience, I have participated in numerous investigations involving bank robberies.

2. I submit this affidavit in support of a criminal complaint and arrest warrant for Alexander Samuel Stewart for bank robbery, in violation of 18 U.S.C. § 2113(a). As set forth below, there is probable cause to believe, and I do believe, that Alexander Stewart committed bank robbery in violation of 18 U.S.C. § 2113(a).

3. This affidavit is intended to show only that there is sufficient probable cause for the requested complaint and arrest warrant and does not set forth all of my knowledge about this matter. The facts set forth in this affidavit are based on my own personal knowledge, knowledge obtained from other individuals during my participation in this investigation, including other law enforcement officers, interviews of witnesses, a review of records related to this investigation,

communications with others who have knowledge of the events and circumstances described herein, and information gained through my training and experience.

**Applicable Law**

4. 18 U.S.C. § 2113(a) prohibits a person from using force and violence, or intimidation, to knowingly and unlawfully take or attempt to take currency or any other thing of value from a bank whose deposits are insured by the Federal Deposit Insurance Corporation (FDIC).

**Statement of Probable Cause**

5. On March 20, 2020, Gresham Police Department (GPD) responded to a robbery of the Key Bank located at 1532 NE 181<sup>st</sup> Ave, Gresham, OR 97230, which at that time was a federally insured institution. The robbery occurred at approximately 9:39 a.m. The bank was robbed of U.S. currency.

6. On March 20, 2020, I received images of the robbery from Key Bank's Physical Security Manager. Additionally, I received the bank's robbery packet which detailed the loss amount to be \$1,064.00 U.S. currency.

7. On March 20, 2020, Victim Teller #1 was interviewed by GPD Officer Delong and reported, she was the lead teller at the branch. She was working at her window (western most window) as a white male, hereinafter referred to as the robbery, and entered the bank. The robber slid a note under the glass partition, which partially separated the teller from customers. The robber said, "I need cash. Don't press the alarm." Victim Teller #1 then gave the robber cash, which was in the care and custody of Key Bank, along with a hidden tracking device. Victim Teller #1 gave the robber small and large bills, however the robber stated, "I need more. I need

more," the robber then walked out the south doors, taking the note with him. Victim Teller #1 described the robber as a white male approximately 5'4".

8. On March 20, 2020, Manager #1 was interviewed by GPD Officer Delong and reported, the robber had knocked on the door of the north (Barr Rd) entrance. Manager #1 unlocked the door, the robber told her he wished to cash a check. Manager #1 allowed the robber to come inside after learning he was on foot and unable to use the drive-up window. Manager #1 watched the robber walk up to Victim Teller #1's window. Manager #1 then saw Victim Teller #1's gave a pre-arranged signal that she was being robbed. Manager #1 went into her office and called 9-1-1. Manager #1 described the robber as a white male approximately 5'5" to 5'7", 135 lbs., with a thin build, and wearing a black hoodie.

9. On March 20, 2020, Employee #1 was interviewed by GPD Officer Delong and reported that Manager #1 came into his office and told him that Victim Teller #1 was being robbed. Employee #1 activated the silent alarm button and watched the robbery. Employee #1 observed the robber walk away from Victim Teller #1's window and exit the bank via the south doors. The robber walked east bound on the south sidewalk of Barr Rd then turned right (SB) on 183rd Av (west sidewalk), where he walked out of sight. Employee #1 described the robber as a white male approximately 5'6", 130 lbs, with blonde hair, and wearing a sweater or hoodie.

10. On March 20, 2020, GPD Detective Crate, the assigned GPD detective to the case, issued a Detectives Bulletin, Attempt to Identify, for the robbery of the Key Bank Located at 532 NE 181st Ave, Gresham, OR 97230. The bulletin contained an image of the robbery suspect.

11. On March 25, 2020, Detective Crate was contacted by Wasco County Probation Officer (WCPO) Shawn Anderson. WCPO Anderson advised he had seen the bulletin attempting

to identify a bank robber from March 20, 2020. WCPO Anderson told Detective Crate he was “100% certain” the pictured suspect was Alexander Stewart date of birth 9/20/1990. WCPO Anderson advised that he received a phone call from one of Stewart’s family members who observed the Facebook post and identified Stewart as the robber. WCPO Anderson stated he received information from other family members of Stewart’s indicating Stewart might be heading to his sister’s house in Little Rock, Arkansas.

12. On March 25, 2020, after speaking with WCPO Anderson, Detective Crate conducted a computer query of Alexander and viewed a booking and Oregon DMV photo. Detective Crate compared the booking photo to the surveillance footage from Key bank and affirmed Stewart was in fact the pictured suspect.

13. On March 25, 2020, Detective Crate received a phone call from a family member of Stewart, "Monte," who advised that he was the uncle of Alexander Stewart. Monte viewed the surveillance image from Facebook and affirmed the person pictured was his nephew Alexander Stewart. Monte told Detective Crate that Stewart arrived at his sister’s house the morning of 3/25/20, located in Little Rock, Arkansas. Additionally, Stewart had admitted to family members he had robbed a bank.

14. On March 26, 2020, I reviewed the Oregon DMV information and photo for Alexander Samuel Stewart, date of birth 9/20/1990. Stewart is listed as 5’8” tall, 153 lbs., with blonde hair, and blue eyes. After review, I affirm Alexander Samuel Stewart is the robbery suspect from the Key Bank robbery on 3/20/2020.

### **Conclusion**

15. Based on the foregoing, I have probable cause to believe, and I do believe, that Alexander Samuel Stewart committed bank robbery, in violation of 18 U.S.C. § 2113(a). I

therefore request that the Court issue a criminal complaint and arrest warrant for Alexander Samuel Stewart.

16. Prior to being submitted to the Court, this affidavit, the accompanying complaint and the arrest warrant were all reviewed by Assistant United States Attorney (AUSA) Gregory R. Nyhus. AUSA Nyhus advised me that, in his opinion, the affidavit and complaint are legally and factually sufficient to establish probable cause to support the issuance of the requested criminal complaint and arrest warrant.

By phone

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ZACHARY CLARK  
Special Agent, FBI

Sworn in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone at 9:50  
a.m./p.m. on ~~March~~ April 2, 2020.



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HONORABLE STACIE F. BECKERMAN  
United States Magistrate Judge